

# EXHIBIT 3

Videotaped Deposition of  
**Tracy Wolff**  
March 07, 2023

Freeman

vs.

Deebs

**Confidential**



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Freeman vs.  
Deebs

Tracy Wolff

1 MR. BAER: For the record, should I state my  
2 name?

3 MR. PASSIN: I already said your name.

4 Q. (By Mr. Passin) And who is the publisher of each  
5 of the books in the Crave books series? And by the way  
6 I'll refer to those books as the Crave books series. Is  
7 that understood?

8 A. Yes.

9 Q. Okay. Who is the publisher of the books?

10 A. The publisher is Entangled.

11 Q. And who distributes the books?

12 A. Macmillan.

13 Q. Now, what did you do to prepare for your  
14 deposition today?

15 A. I read over some of the papers from the case that  
16 had been filed with the court and I met with my lawyers  
17 yesterday.

18 Q. When you said you read some of the papers from  
19 the case, did you pick those out yourself or did your  
20 lawyers send those to you?

21 MR. GOETZEL: Object to the form of the  
22 question. You're getting into a privileged area here.

23 MR. PASSIN: Right, it's just -- I'm trying  
24 to lay the foundation so that I won't. All I want to  
25 know is did she get them herself or did the lawyer pick

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1     **Rising or Masked?**

2         A.   No.

3         **Q.   Why did you choose Alaska as the setting for the**  
4     **Crave book series?**

5         A.   I think there were several reasons.

6         **Q.   And you were the one who chose Alaska?**

7         A.   I chose it, yes.

8         **Q.   And what were those several reasons?**

9         A.   The first reason was when I was writing a  
10       snowboarding book many years ago, I watched a  
11       documentary called The Art of Flight and there was a  
12       line in it where they were walking in Alaskan wilderness  
13       and they made the comment that they were walking where  
14       no human being had ever stepped before, and it seemed to  
15       me that that would be a good place to put paranormals.

16               The second reason is in the first ideas I gave  
17       Stacy Cantor Abrams regarding what would become the  
18       Crave series, one of the ideas was vampires set in  
19       Alaska. And I believe -- I don't know specifically what  
20       made me choose that except for The Art of Flight  
21       documentary and the fact that Alaska tends to be dreary  
22       and have civil twilight and be dark.

23               I do know that one of my favorite vampire novels  
24       ever was in Alaska. It's -- and I always thought that  
25       was a very cool setting for vampires.

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1 Q. And which novel was that?

2 A. Dancing in the dark by Sherrilyn Kenyon.

3 Q. Okay. I didn't mean to cut you off there. Are  
4 there other reasons?

5 A. Other reasons is when I was brainstorming, I  
6 really wanted a fish out of water story. It's one of --  
7 well, Liz really wanted a fish out of water story and I  
8 thought that was a really great idea. And being from  
9 San Diego, the thing -- like, I tried to imagine where  
10 in North America I would feel most uncomfortable. And  
11 Alaska came to mind.

12 When I was brainstorming, it was one of the  
13 places I had listed and then when I was brainstorming  
14 with Emily Sylvan Kim, we were talking over cold and  
15 dark places in North America and she reminded me -- I  
16 believe it was she reminded me of Alaska, that I had put  
17 it -- you know, that I had mentioned it. And I thought  
18 about it and decided that was a really great place.

19 And then when I went and talked to Liz about it,  
20 Liz had just come back on a cruise from Alaska and she  
21 was very excited about Alaska as well because she had  
22 just been on the cruise. And it just seemed like  
23 overall, all those things came together and seemed like  
24 a great place to set the book.

25 Q. All right. Well, you had mentioned that Alaska

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1 months as well. Maybe three, I don't know. Somewhere  
2 between two and three. I feel like most of them did.  
3 Court took longer, but it was the longest book.

4 **Q. And what about Covet? I think we skipped Covet**  
5 **unless I missed it.**

6 A. Yeah, I think approximately the same amount of  
7 time. That seems about right.

8 **Q. And is it fair to say --**

9 A. Two to three months.

10 **Q. -- that you write -- you can write a book faster**  
11 **than most authors write?**

12 A. I don't think -- I don't know how fast other  
13 authors can write a book. So I don't think that is a  
14 question I can answer.

15 **Q. But you seem to have a reputation for being able**  
16 **to write books quickly. Is that correct?**

17 A. I do believe that I can -- I can write books  
18 quickly, yes.

19 **Q. When did you start and when did you finish**  
20 **writing each one of the books in the Crave book series?**  
21 **And then you can limit it to the four that are the**  
22 **subject of this litigation.**

23 A. I honestly cannot give you exact dates. I  
24 believe with Crave, they contacted me in late April, so  
25 I believe I probably started writing in May. I believe

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1 it took a couple of months. I know that it didn't get  
2 edited until December, I believe. I think it was -- it  
3 was November or December. It was -- it was in the  
4 wintertime and that required more writing as well.

5 Crush, I believe was a couple of months. I  
6 believe I was -- I don't know when exactly. I do  
7 believe I was writing it in June, and I only remember  
8 that because my dog died. Covet was over Thanksgiving,  
9 so some time in the Fall. Court, Court was Summer, and  
10 I remember that because my partner got COVID in August  
11 when I was writing Court. And those are the four books.

12 Q. Is it fair to say that Crave is the most  
13 commercially successful book you've ever written?

14 A. I believe that's fair to say, yes.

15 Q. How many copies of Crave in all formats have you  
16 sold?

17 A. I have no idea.

18 Q. Is it fair to say that you sold more copies of  
19 Crave in all formats than you've ever sold of any other  
20 book?

21 A. I believe that's fair.

22 Q. Okay. Other than any of the books in the Crave  
23 book series, what was the greatest number of copies in  
24 all the formats of any other book that you sold?

25 A. I have no idea.